

September 14, 2011

**VIA ELECTRONIC MAIL**

Ms. Lori Houck Cora  
Assistant Regional Counsel  
United States Environmental Protection Agency  
ORC-158  
Region 10  
1200 Sixth Avenue  
Seattle, WA 98101-3123

Re: Linnton Plywood Association--Environmental Protection Agency  
Portland Harbor Superfund Site, Portland, Oregon; Linnton Plywood Association  
Ability to Pay Information  
File No. 093907.0007

Dear Lori:

Thank you for the extension of time you granted for Linnton Plywood Association ("LPA") to respond to your July 20 request for financial information. Per your request, attached is the signed Declaration of the Corporate Secretary/Treasurer.

Following is LPA's response to EPA's request as reflected in your Attachment 1:

- a. Tax Returns. Attached are LPA's 2009 and 2010 U.S. Income Tax Returns for Cooperative Associations (Form 1120-C)
- b. Annual financial statements. Attached are LPA's Balance Sheets for Profits and Losses for March 31, 2011, fiscal year-end, and for June 30, 2011. In addition, attached is LPA's September 6, 2011, pro forma itemization of monthly expenses and accruals. Note the termination of the Glacier Lease effective October 31, 2011. The only remaining rental income will be that paid by Harmer Steel.
- c. Litigation. LPA is not currently and does not anticipate becoming a party to any litigation.
- d. Financial Settlements. LPA has received over the past year \$125,000 in nonrefundable earnest money from the prospective purchaser. This amount applies to the purchase price. The termination of the Forest Products

Machinery Lease resulted in the loss of rental income, which was offset in part by approximately \$94,000 in equipment foreclosure sale procedures. No amounts have been received in settlement monies from any insurer or other party.

- c. Credit. The Company has no lines of credit and has not applied for any.
- f. Insurance. All information responsive to this request has been previously been provided. Coverage counsel may be able to provide any new or updated information.
- g. Land Purchase and Sale Agreement. Attached is the Land Purchase and Sale Agreement ("Agreement for Development and Purchase of Restoration Site"), together with Amendments 1 through 3. The parties are currently negotiating the terms of a fourth amendment. It is expected to provide for closing in January 2012.
- h. Share Redemption and Retains. There is no updated information regarding share redemption and retains that LPA owes its member shareholders.
- i. Additional Information. LPA will provide any additional relevant information should it become available.

Please contact us with respect to any questions or need for clarification raised by these responses to your request for financial information.

Very truly yours,

LANE POWELL PC



William P. Hutchison

WPH:maw  
Enclosures  
cc (w/enc):

Paul B. George, Esq. (Via Electronic Mail)